

**IN THE UNITED STATES DISTRICT COURT  
FOR THE WESTERN DISTRICT OF VIRGINIA  
LYNCHBURG DIVISION**

CLERKS OFFICE U.S. DIST. COURT  
AT LYNCHBURG, VA  
FILED  
4/2/2020

JULIA C. DUDLEY, CLERK  
BY: s/ CARMEN AMOS  
DEPUTY CLERK

UNITED STATES OF AMERICA and  
THE COMMONWEALTH OF VIRGINIA,  
*ex. rel.* Matthew A. Bolinger, M.D.,

Plaintiffs,

v.

CENTRA HEALTH, INC. and  
BLUE RIDGE EAR, NOSE, THROAT,  
& PLASTIC SURGERY, INC.,

Defendants.

Civil Action No. 6:16-CV-00033

**JOINT STIPULATION OF DISMISSAL**

The United States of America, the Commonwealth of Virginia, and Relator Matthew A. Bolinger, M.D., by counsel, file this Joint Stipulation of Dismissal pursuant to Federal Rule of Civil Procedure 41(a)(1)(A)(i), the Settlement Agreement executed with Defendant Centra Health, Inc., Centra Medical Group, LLC, and Southside Community Hospital, Inc. (Centra Agreement), and the Settlement Agreement executed with Defendant Blue Ridge Ear, Nose, Throat & Plastic Surgery, Inc. (Blue Ridge ENT Agreement).

In accordance with Paragraph 15 of the Centra Agreement and Paragraph 14 of the Blue Ridge ENT Agreement, and Federal Rule of Civil Procedure 41(a)(1)(B), the dismissal shall be as follows:

- (1) With Prejudice as to Relator's claims alleged in the Complaint (ECF No. 1);
- (2) With Prejudice as to claims of the United States or the Commonwealth of Virginia against Defendant Centra Health, Inc., Centra Medical Group, LLC, or Southside

Community Hospital, Inc. for the Covered Conduct described in Recital Paragraphs E and G of the Centra Agreement;

(3) With Prejudice as to claims of the United States or the Commonwealth of Virginia against Defendant Blue Ridge ENT for the Covered Conduct described in Recital Paragraph D of the Blue Ridge ENT Agreement; and

(4) Without Prejudice as to all claims of the United States or the Commonwealth of Virginia other than claims for the Covered Conduct in the above referenced Settlement Agreements.

This Stipulation does not dismiss any claims reserved by the terms of either of the Settlement Agreements or as contained in separate agreements, if any, by and among any of the parties.

The parties respectfully request that the Court enter an Order in the form of the attached proposed Order.

Respectfully Submitted,

Dated: April 2, 2020

DANIEL P. BUBAR  
Attorney for the United States,  
Acting Under Authority Conferred by  
28 U.S.C. § 515.

/s/ Sara Bugbee Winn  
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Dated: April 2, 2020

COMMONWEALTH OF VIRGINIA

/s/ Kimberly M. Bolton

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Dated: April 2, 2020

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Counsel for Relator

**CERTIFICATE OF SERVICE**

I certify upon entry of the Court's order unsealing this case I will send a copy of the foregoing by email to counsel for Defendants as follows:

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